

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

JOHN DOE #1, an individual, JOHN DOE
#2, an individual, and PROTECT
MARRIAGE WASHINGTON,

Plaintiffs,

v.

SAM REED, in his official capacity as
Secretary of State of State of Washington,
BRENDA GALARZA, in her official
capacity as Public Records Officer for the
Secretary of State of State of Washington,

Defendants.

NO. 3:09-CV-05456-BHS

DECLARATION OF LORI
ANDERSON

I, Lori Anderson, declare as follows:

1. I am over the age of 18 and competent to testify on the matters contained in this Declaration.

2. I am currently employed by the Washington State Public Disclosure Commission (PDC) as a Communications and Training Officer. I have been employed at the PDC since August 1999. My primary duties are to coordinate training for political campaigns and filers, coordinate publications and outreach efforts, assist filers and respond to media inquiries. During my tenure with the PDC, I have also served as a Political Finance Specialist for the PDC. In that capacity, my duties included assisting filers, auditing campaigns, and

1 investigating complaints. Prior to the PDC, I was a legal secretary for 20 years (which
2 includes the Washington State Attorney General's Office and the Office of Administrative
3 Hearings, and three years with a private law firm).

4 3. The PDC has a website at www.pdc.wa.gov. Many types of information are
5 posted on the website, including copies of the PDC's laws and rules at RCW 42.17 and Title
6 390 WAC, instruction manuals and other assistance for filers, campaign finance reports, and
7 other information. Each year the PDC also posts on the website "key reporting dates" for
8 political committees. In September 2008, I prepared a document titled "2009 Key Reporting
9 Dates for Political Committees." A copy is attached at Exhibit A. This document was made
10 available to the public in 2008 upon request and also posted on the PDC's website on
11 January 8, 2009 under the tab "Filer Resources." This document sets out the filing dates for
12 political committees in 2009 and well in advance of the November 3, 2009 General Election.
13 It also alerts filers to the 21-day time period that is referenced in RCW 42.17.105(8). This
14 year, that 21-day period starts October 13, 2009.

15 4. In September 2009 I responded to a voicemail forwarded to me by Nancy Krier,
16 the PDC's General Counsel. The caller was an attorney and I believe he was named Scott
17 Bieniek. My long distance telephone records show I telephoned (812) 232-2434 on
18 September 15, 2009, and I believe that was the day I returned Mr. Bieniek's call. I recall he
19 had a question concerning the \$5,000/21-day provision in RCW 42.17.105(8). He wanted to
20 know if the provision applied to political committees. I explained that it did. I explained to
21 him that October 13, 2009 was the start of the 21-day period for the 2009 general election. I
22 explained that contributions over \$5,000 from any one source needed to be in possession of the
23 committee by October 12, 2009. At the end of the call, I recall he commented that he was
24 representing a client, whom he did not name, and that he would be informing them about the
25 provision in RCW 42.17.105(8).
26

1 I declare under penalty of perjury under the laws of the state of Washington that the
2 foregoing is true and correct and of my own knowledge.

3 DATED and SIGNED this 2nd day of October, 2009 at Olympia, Washington.

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5 LORI ANDERSON
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2009 Key Reporting Dates for Political Committees

DATE	ACTIVITY	C-4 REPORT PERIOD
Within two weeks of forming a committee	File a C-1pc (file an amended C-1pc within ten days of change in committee makeup) ¹	
Jan 12	File monthly C-4 & C-3, if necessary	close of last report thru Dec 31
Feb 10	" "	close of last report thru Jan 31
Mar 10	" "	close of last report thru Feb 28
Apr 10	" "	close of last report thru Mar 31
May 11	" "	close of last report thru Apr 30
June 1	Begin filing C-3 reports weekly, each Monday, for deposits made during previous 7 days (Monday thru Sunday)	
June 10	File monthly C-4, if necessary	close of last report thru May 31
July 7	Final day to change from mini to full reporting without special circumstances ²	
July 28	21 day pre-primary C-4 due ³	June 1 thru July 27
Aug 10 - 17	Committee books open for public inspection	
Aug 11	7 day pre-primary C-4 due	July 28 thru Aug 10
Aug 11 - 17	Special reports due if committee makes or receives contributions of \$1,000 or more from one source. ⁴	
Aug 18	PRIMARY ELECTION DAY	
Sept 10	Post-primary C-4 due	Aug 11 thru Aug 31
Sept 22	Final day to change from mini to full reporting without special circumstances ²	
Oct 13	21 day pre-general C-4 due	Sep 1 thru Oct 12
Oct 13 – Nov 2	Special reports due if committee makes or receives Contributions of \$1,000 or more in the aggregate. ³ Further, unless the contributor is a <u>state committee</u> of a bona fide Political party, no committee may now: 1) receive contributions over \$5,000 in the aggregate from one source or 2) make aggregate Contributions totaling over \$5,000 to a candidate or other political committee.	
Oct 26 – Nov 2	Campaign books open for public inspection	
Oct 27	7 day pre-general C-4 due	Oct 13 thru Oct 26
Nov 3	GENERAL ELECTION DAY	
Dec 10	Post-general C-4 due (and C-3, if necessary)	Oct 27 thru Nov 30
Jan 11 (2010)	End of election cycle C-4 due (and C-3, if necessary)	Dec 1 thru Dec 31

¹ Committees forming within 3 weeks of the election must file C-1pc within 3 business days of organizing.

² See WAC 390-16-125.

³ Primary reports not required of committees only supporting or opposing general election ballot issues. These committees file monthly reports for June, July, August – these reports are due on the 10th of the following month.

⁴ Does not constitute authority to exceed any applicable local or state contribution limit.